

EXHIBIT A

From: Betty Tufariello <PBtufariello@intellectulaw.com>
Date: April 3, 2019 at 7:03:41 PM EDT
To: "Berman, Jeremy A." <JBerman@reedsmith.com>
Cc: "Raymond, Peter D." <PRaymond@ReedSmith.com>, Alina Orban <AOrban@intellectulaw.com>, "Kadosh, Samuel" <SKadosh@ReedSmith.com>, Mark Ingber <ingber.lawfirm@gmail.com>, "ingber.law@verizon.net" <ingber.law@verizon.net>, Betty Tufariello <intellectulaw@gmail.com>
Subject: RE: Follow-Up Requests from Ms. Isidor Horta's Deposition

Jeremy:

Good afternoon. I hope my email finds you and your colleagues well.

Set forth below is a link to all of the emails my client was able to retrieve following her search, the scope of which we set forth in our March 22, 2019 email.

<https://www.dropbox.com/sh/otgitjo6az9k8h7/AACSxRJciGKv912HujtisbyEa?dl=0>

For ease of identification, the link sets forth the emails in date order. Further, if the email makes reference to an attachment, the attachments follow the email they are referenced to (if we found them) numbered consecutively. The only attachments we have provided are the one we actually found attached to the emails.

The link also contains our client's Deposition Errata Sheets. It the last file in the folder to which the link directs you to.

Here for you- Betty.

Your Brand Professional- Your better business partner.

P. Betty Tufariello, Esq.

Intellectulaw™

The Law Offices of P.B. Tufariello, P.C.

25 Little Harbor Road

Mount Sinai, NY 11766

Telephone: 631-476-8734

Fax: 631-476-8737

E-mail: pbtufariello@intellectulaw.com

Twitter: <https://twitter.com/intellectulaw>

LinkedIn: <https://www.linkedin.com/in/bettytufariello/>

On the web at:

www.intellectulaw.com

www.trademarklawyers.nyc

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From: Berman, Jeremy A. [<mailto:JBerman@reedsmith.com>]

Sent: Wednesday, April 03, 2019 12:34 PM

To: Betty Tufariello <PBtufariello@intellectulaw.com>

Cc: Raymond, Peter D. <PRaymond@ReedSmith.com>; Alina Orban <AOrban@intellectulaw.com>; Kadosh, Samuel <SKadosh@ReedSmith.com>

Subject: RE: Follow-Up Requests from Ms. Isidor Horta's Deposition

Betty,

Your March 29 email stated that you would be making a document production by the end of that day, but we have not received any documents to date. Please confirm that you will make the additional production today.

Best,

Jeremy Berman

212.549.4241

JBerman@reedsmith.com

ReedSmith LLP

599 Lexington Ave | New York | NY | 10022

Phone: 212.521.5400 | Fax: 212.521.5450

From: Betty Tufariello <PBtufariello@intellectulaw.com>

Sent: Friday, March 29, 2019 3:34 PM

To: Berman, Jeremy A. <JBerman@reedsmith.com>

Cc: Raymond, Peter D. <PRaymond@ReedSmith.com>; Alina Orban <AOrban@intellectulaw.com>; Kadosh, Samuel <SKadosh@ReedSmith.com>

Subject: RE: Follow-Up Requests from Ms. Isidor Horta's Deposition

Hi Jeremy:

We have received the emails our client has secured as a result of her searching pursuant to your requests. We have just completed our conversion and we are in the process of redacting any and all information that we believe is protected by the attorney-client privilege. After that, we will be numbering and submitting everything to you. It is our objective to provide everything to you by the end of the day today, if not sooner.

Here for you- Betty.

Your Brand Professional- Your better business partner.

P. Betty Tufariello, Esq.

Intellectulaw™

The Law Offices of P.B. Tufariello, P.C.

25 Little Harbor Road

Mount Sinai, NY 11766

Telephone: 631-476-8734

Fax: 631-476-8737

E-mail: pbtufariello@intellectulaw.com

Twitter: <https://twitter.com/intellectulaw>

LinkedIn: <https://www.linkedin.com/in/bettytufariello/>

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www.intellectulaw.com

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From: Berman, Jeremy A. [<mailto:JBerman@reedsmith.com>]

Sent: Friday, March 29, 2019 2:11 PM

To: Betty Tufariello <PBTufariello@intellectulaw.com>

Cc: Raymond, Peter D. <PRaymond@ReedSmith.com>; Alina Orban <AOrban@intellectulaw.com>;

Kadosh, Samuel <SKadosh@ReedSmith.com>

Subject: RE: Follow-Up Requests from Ms. Isidor Horta's Deposition

Betty,

Per your March 22, 2019 email, we expected a production of additional documents no later than today. Can you confirm that you will be making the production today? Also, can you provide us with the results of the outstanding searches identified in Sam's March 22 email?

Best,

Jeremy Berman

212.549.4241

JBerman@reedsmith.com

ReedSmith LLP

599 Lexington Ave | New York | NY | 10022

Phone: 212.521.5400 | Fax: 212.521.5450

From: Kadosh, Samuel <SKadosh@ReedSmith.com>

Sent: Friday, March 22, 2019 5:07 PM

To: 'Betty Tufariello' <PBTufariello@intellectulaw.com>; Berman, Jeremy A. <JBerman@reedsmith.com>

Cc: Raymond, Peter D. <PRaymond@ReedSmith.com>; Alina Orban <AOrban@intellectulaw.com>

Subject: RE: Follow-Up Requests from Ms. Isidor Horta's Deposition

Betty,

Thank you for the update. We also asked that Ms. Horta search the portable hard drive that she used for backup for emails or files relating to Latinfoods, and that Julio Isidor's office and computer be searched for hard-copy and electronic files he may have. I look forward to seeing the additional production next week.

Best Regards,

Samuel Kadosh
212-549-0451
SKadosh@ReedSmith.com

Reed Smith
599 Lexington Avenue
New York, NY 10022
212-521-5400 (**Main Number**)
212-521-5450 (**Fax Number**)

From: Betty Tufariello <PBtufariello@intellectulaw.com>
Sent: Friday, March 22, 2019 12:37 PM
To: Berman, Jeremy A. <JBerman@reedsmith.com>
Cc: Raymond, Peter D. <PRaymond@ReedSmith.com>; Kadosh, Samuel <SKadosh@ReedSmith.com>; Alina Orban <AOrban@intellectulaw.com>
Subject: RE: Follow-Up Requests from Ms. Isidor Horta's Deposition

EXTERNAL E-MAIL

Jeremy:

Good Morning.

Our client has in fact forwarded some emails. But she is not done yet. She will be forwarding additional materials by the beginning of next week.

We are in the process of reviewing and formatting what she has already sent to us and we will be producing everything next week, once our client is done forwarding everything. From our review of what we already have in hand, I can assure you that it contains nothing that you don't already have. So, I have to disagree with your representations that your client has been prejudiced in any way.

As per your request during her deposition our client has conducted the following searches:

In connection with the account Jalinei@cibaomeat.com, Ms. Horta searched the following email addresses:

- wilzul68@gmail.com . She located only a smattering of emails which she has provided us with for production.
- WilsonZ@latinfoodus.com. She located a few more emails which she will be forwarding to us shortly via a link, as they are in a format that she cannot send to us through normal email.
- WILSON.ZULUAGA@LATIN-FOOD.COM. She found only 1 email.
-

In connection with the account JGIsidor88@gmail.com, Ms Horta searched the following email addresses:

- wilzul68@gmail.com. She located 1 email RE: Casings Revised with New Logo
- WilsonZ@latinfoodus.com. She located only a few.

- WILSON.ZULUAGA@LATIN-FOOD.COM . Once again she only found 1.

In connection with JGIsidor88dr@hotmail.com, Ms. Horta searched the following email addresses:

- wilzul68@gmail.com NONE
- WilsonZ@latinfoodus.com NONE
- WILSON.ZULUAGA@LATIN-FOOD.COM NONE

In connection with YayiPhotography@gmail.com, Ms. Horta searched the email addresses set forth below:

- wilzul68@gmail.com: No results
- WilsonZ@latinfoodus.com No results
- WILSON.ZULUAGA@LATIN-FOOD.COM No results.

In connection with YayiPortraits@gmail.com, Ms Horta searched the following email addresses:

- wilzul68@gmail.com. No results.
- WilsonZ@latinfoodus.com No results.
- WILSON.ZULUAGA@LATIN-FOOD.COM No results.

Ms. Horta's attempt to secure emails from Cibao Meats' webmail was unavailing as Emails from cibaomeat.com/webmail are no longer available. The way settings have been set up, emails are deleted and the queue is emptied once emails are forwarded to Ms. Horta's and other Cibao employees' Outlook accounts. Accordingly, when her IT specialist searched for emails in Cibao's Webmail server, he found nothing.

At this time the only search left outstanding is the search in Mr. Julio Isidor's own Outlook email account. We should be able to provide you with an update on that search early next week.

Please let me know whether our search parameters are acceptable to you or if there are any other terms you might want our client to search so that she can conduct that search as well, in time for next week's production.

Regards,

P. Betty Tufariello, Esq.
Intellectulaw™
The Law Offices of P.B. Tufariello, P.C.
25 Little Harbor Road
Mount Sinai, NY 11766
Telephone: 631-476-8734
Fax: 631-476-8737
E-mail: pbtufariello@intellectulaw.com
Twitter: <https://twitter.com/intellectulaw>
LinkedIn: <https://www.linkedin.com/in/bettytufariello/>

On the web at:

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From: Berman, Jeremy A. [<mailto:JBerman@reedsmith.com>]
Sent: Friday, March 22, 2019 10:41 AM
To: Betty Tufariello <PBtufariello@intellectulaw.com>
Cc: Raymond, Peter D. <PRaymond@ReedSmith.com>; Kadosh, Samuel <SKadosh@ReedSmith.com>
Subject: RE: Follow-Up Requests from Ms. Isidor Horta's Deposition

Betty,

Will you be providing this information today?

Jeremy Berman
212.549.4241
JBerman@reedsmith.com

ReedSmith LLP
599 Lexington Ave | New York | NY | 10022
Phone: 212.521.5400 | Fax: 212.521.5450

From: Berman, Jeremy A.
Sent: Wednesday, March 20, 2019 2:51 PM
To: 'Betty Tufariello' <PBtufariello@intellectulaw.com>
Cc: Raymond, Peter D. <PRaymond@ReedSmith.com>; Kadosh, Samuel <SKadosh@ReedSmith.com>
Subject: RE: Follow-Up Requests from Ms. Isidor Horta's Deposition

Betty,

I write to follow up on my March 13 email requesting additional documents identified at Ms. Horta's deposition. My client has suffered substantial prejudice because Ms. Horta and Cibao have not searched through all of their devices and emails for relevant documents, as required by the subpoena.

Please provide the requested information by Friday, March 22.

Jeremy Berman
212.549.4241
JBerman@reedsmith.com

ReedSmith LLP
599 Lexington Ave | New York | NY | 10022
Phone: 212.521.5400 | Fax: 212.521.5450

From: Berman, Jeremy A.
Sent: Wednesday, March 13, 2019 10:17 AM
To: 'Betty Tufariello' <PBtufariello@intellectulaw.com>
Cc: Raymond, Peter D. <PRaymond@ReedSmith.com>; Kadosh, Samuel <SKadosh@ReedSmith.com>
Subject: Follow-Up Requests from Ms. Isidor Horta's Deposition

Betty,

I write to follow up on our request for additional documents identified at the deposition of Ms. Horta on March 7, 2019. Specifically, we request that:

- Ms. Horta's Gmail account, into which emails from her work account were automatically forwarded, be searched for responsive documents. *See* Tr. 94:19-96:2.
- Ms. Horta's personal email account be searched for responsive documents. *See* Tr. 94:15-18.
- The Cibao email accounts of Jaline Isidor Horta and Julio Isidor be searched for responsive documents. The search should encompass emails that (a) are stored locally on their individual computers, (b) are stored on company servers, (c) can be accessed through Cibao's direct web email interface, or (d) can be accessed by any other means through which emails in that system can be retrieved. *See* Tr. 96:6-97:9, 99:4-14.
- The Gmail account for Yayi Photography be searched for responsive documents. *See* Tr. 97:10-23.
- Ms. Isidor Horta's external hard drive be searched for responsive documents. *See* Tr. 98:14-99:6.
- All responsive documents located in Mr. Isidor Horta's office be produced. *See* Tr. 107:3-16.
- Julio Isidor's computer be searched for responsive documents. *See* Tr. 110:10-16.

A copy of the transcript of Ms. Horta's deposition is attached. Please provide us the requested information no later than March 18, 2019.

Best regards,

Jeremy Berman

212.549.4241

JBerman@reedsmith.com

ReedSmith LLP

599 Lexington Ave | New York | NY | 10022

Phone: 212.521.5400 | Fax: 212.521.5450

* * *

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